

The Honorable Robert J. Bryan

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA**

STATE OF WASHINGTON,

Plaintiff,

v.

THE GEO GROUP, INC.,

Defendant.

CIVIL ACTION NO. 17-cv-05806-RJB

DECLARATION OF MARSHA CHIEN  
IN SUPPORT OF PLAINTIFF STATE  
OF WASHINGTON'S RESPONSE TO  
THE GEO GROUP, INC.'S RULE 50(b)  
MOTION FOR JUDGMENT AS A  
MATTER OF LAW

Pursuant to 28 U.S.C. § 1746(2), I, Marsha Chien, state and declare as follows:

1. I am over eighteen years of age. I have personal knowledge of, and am competent to testify about, the matters contained herein.

2. I am an Assistant Attorney General for the Office of the Attorney General of Washington and one of the attorneys representing the State of Washington in this matter.

3. Attached hereto as Exhibits A–O are true and correct copies of excerpts of the trial transcript as follows:

Exhibit No.	Date	Testimony
Exhibit A	June 2, 2021	Alisha Singleton, former GEO Classification Officer
Exhibit B	June 2, 2021	William McHatton, former GEO Associate Warden
Exhibit C	June 3, 2021	John Patrick Griffin, former GEO Kitchen Supervisor

Exhibit D	June 3, 2021	Bertha Henderson, GEO Food Service Administrator
Exhibit E	June 3, 2021	Jose Medina Lara, former detainee worker
Exhibit F	June 4, 2021	Alisha Singleton, former GEO Classification Officer
Exhibit G	June 4, 2021	Iolani Menza, GEO Detention Officer
Exhibit H	June 4, 2021	Orlando Marquez, former detainee worker
Exhibit I	June 7, 2021	David Tracy, GEO Detention Officer
Exhibit J	June 7, 2021	Karla Gomez Soto, former detainee worker
Exhibit K	June 8, 2021	Ryan Kimble, GEO Assistant Warden of Finance
Exhibit L	June 9, 2021	Brian Evans, GEO Chief Financial Officer
Exhibit M	June 9, 2021	Ugochukwu Goodluck Nwauzor, class representative and former detainee worker
Exhibit N	June 11, 2021	Sarah Sytsma, Director of Correctional Industries
Exhibit O	June 11, 2021	Byron Eagle, SCC Chief of Residential Operations
Exhibit P	June 14, 2021	Dan Ragsdale, GEO Executive Vice President for Contract Compliance

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 2nd day of August 2021 in Seattle, Washington.

s/ Marsha Chien  
MARSHA CHIEN, WSBA No. 47020

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was electronically filed with the United States District Court using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

Dated this 2nd day of August 2021.



CAITILIN HALL  
Legal Assistant